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MIDDLE SOUTH UTILITIES SYSTEM

November 28, 1984

J.M. CAIN
President and
Chief Executive Officer

W3P84-3312
3-A1.01.04
A4.05

Director of Nuclear Reactor Regulation
Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Waterford 3 SES Docket No. 50-382
REQUEST FOR OPERATING LICENSE

REFERENCES: 1) Letter W3A84-0133, J.M. Cain to D.G. Eisenhut, dated October 5, 1984

2) Letter W3P84-3086, J.M. Cain to D.G. Eisenhut, dated October 31, 1984

3) Letter, D.G. Eisenhut to J.M. Cain, dated June 13, 1984

Dear Mr. Eisenhut:

By letters of October 5, 1984 and October 31, 1984, I submitted a request for authorization to load fuel and perform pre-criticality hot functional testing, based upon LP&L's position that Waterford 3 is physically complete and ready for fuel loading. In view of the current state of plant readiness and resolution of significant safety issues, I am now amending that request to include authorization to operate at power levels up to and including 5% of full power.

Responses to all of the 23 issues identified by the NRC in Reference 3 have now been submitted. The current status of our resolution of the issues fully supports issuance of an operating license conditioned to limit operation to 5% of full power. This position is based upon LP&L's confidence in the hardware and the limited consequences associated with a potential accident for operation up to 5% of full power. The basis for this position is presented below.

At this time the Waterford 3 reactor is fueled completely with new, unirradiated fuel without any fission products. During low power operation the amounts of fission products in the reactor would be approximately proportional to the power level for short-lived radioisotopes and to the total energy produced for long-lived radioisotopes. Even after several months of low power operation, the fission product inventory would still be one to two orders of magnitude less

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than the amount assumed in accident analyses analyzed in the FSAR and the NRC Staff's safety evaluations. Possible accident consequences would be further reduced since the decay heat is also decreased, not only in the rate at which it is released but also in the total amount available. The energy required to damage the reactor in a postulated accident and the capacity of the plant heat removal systems and safety features are not reduced during low power operation. Therefore, postulated accidents involving a failure of these systems would require much longer times to evolve and could be contained by equipment operating at only a few percent of its design capacity. In summary, the possible consequences of a reactor accident during low power operation are limited to a very small fraction of those possible at full power.

Your timely action on this matter is requested. With both the plant and its staff in their current state of readiness, our ability to begin fuel loading and low power testing in the near term will avoid unnecessary delays in the schedule for achievement of commercial operation.

Sincerely,

for J. M. Cain

JMC/KWC/ch

cc: R.S. Leddick, D.E. Dobson, K.W. Cook, J.T. Collins (NRC), D.M. Crutchfield (NRC), G.W. Knighton (NRC), G. Charnoff, L.L. Humphreys, R.L. Ferguson, J. Wilson (NRC), G.L. Constable (NRC), Project Files, Admiristrative Support (2), Licensing Library